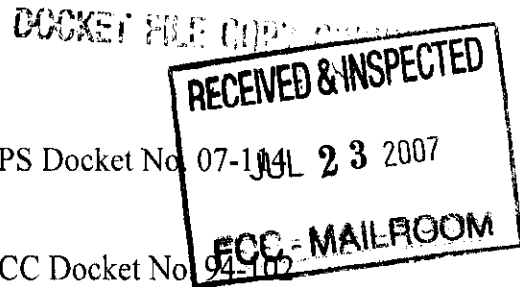


In the Matter of)
)
Wireless E911 Location Accuracy)
Requirements)
)
Revision of the Commission's Rules to Ensure)
Compatibility with Enhanced 911 Emergency)
Calling Systems)
)
Association of Public-Safety Communications)
Officials-International, Inc. Request for)
Declaratory Ruling)
)
911 Requirements for IP-Enabled Service)
Providers)

To: The Commission



WC Docket No. 05-196

REPLY COMMENTS OF INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

The International Association of Fire Chiefs ("IAFC") hereby submits the following reply comments in the above-captioned proceedings to reiterate its support for making clear that Public Safety Answering Point ("PSAP") service areas are the relevant areas for measuring compliance with the Commission's wireless E911 location accuracy rules.

On July 20, 2005, the IAFC filed joint comments in CC Docket 94-102, with the National League of Cities ("NLC") and the National Association of Counties ("NaCO"), in support of a Request for Declaratory Ruling submitted by the Association of Public-Safety Communications Officials ("APCO").¹ On June 1, 2007, the Commission issued a Notice of Proposed Rulemaking ("NPRM") in which it states a "tentative conclusion" consistent with the APCO Request.² The IAFC applauds the Commission's

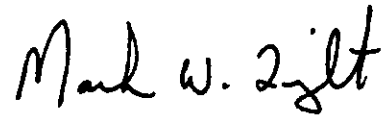
¹ IAFC, NLC, and NaCO noted therein that a similar statement of support had been filed on April 26, 2005, by the International Association of Chiefs of Police, National Sheriffs Association, Major Cities Chiefs Association, and Major County Sheriff's Association. NLC and NaCO have filed joint comments with NATOA in the above-captioned proceedings consistent with the prior position.

² The Commission indicates in the NPRM the record of Docket 94-102 will be incorporated into the above-captioned dockets proceedings.

action and reiterates its view that wireless E9-1-1 accuracy must be measured at the local PSAP level. Otherwise, many PSAPs will receive unacceptable levels of accuracy that could easily slow response time for first responders, and endanger the safety of life and property.

IAFC urges the Commission to proceed quickly and adopt its tentative conclusion with regard to PSAP level accuracy.

Respectfully submitted,

A handwritten signature in black ink, reading "Mark W. Light". The signature is written in a cursive, flowing style.

Mark W. Light, CAE
Executive Director

July 16, 2007